IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff	)	
	)	Cause No: 1:13-cr-00150 WTL-TAB-01
v.	)	
	)	
GUOQING CAO,	)	
	)	
Defendant	)	

MOTION FOR AN INDEPENDENT REVIEW

Defendant Guoqing Cao, by counsel and pursuant to 18 U.S.C. §3145(b), respectfully moves the Court for an independent review of the order of detention issued by the magistrate judge, and in support states:

1. Mr. Cao was arrested and charged first by indictment and subsequently by a superseding indictment with theft of trade secrets, conspiracy, and aiding and abetting in the same.

2. Following a hearing before U.S. Magistrate Judge Dinsmore on October 9, 2013, Mr. Cao was ordered detained without bond.

3. Mr. Cao requests that this Court make an independent determination regarding the issue of his pretrial release. *See, United States v. Portes*, 786 F.2d 758, 761 (7th Cir. 1985). The motion shall be determined promptly. 18 U.S.C. §3145(b).

4. Mr. Cao will submit a brief in support of his request for pretrial release as expeditiously as the Court requires.

WHEREFORE, defendant Guoqing Cao requests that the court conduct an independent review of the detention order and enter an order releasing Mr. Cao subject to conditions established by the Court.

Dated: October 11, 2011

Respectfully submitted,

/s/ David J. Hensel

David J. Hensel, Attorney No. 15455-49
PENCE HENSEL LLC
135 N. Pennsylvania Street, Suite 1600
Indianapolis, Indiana 46204-2428
Telephone: (317) 833-1111
Fax: (317) 833-1199

Alain Leibman (*pro hac vice* pending)
FOX ROTHSCHILD LLP
Princeton Pike Corporate Center
977 Lenox Drive, building 3
Lawrenceville, NJ 08648-2311
Telephone: (609) 895-6743
Fax: (609) 896-1469

Attorneys for Guoqing Cao

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of October, 2013, I electronically filed the forgoing with the clerk of the court by using the CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Cynthia A. Ridgeway
Assistant United States Attorney
Cynthia.ridgeway@usdoj.gov

Scott C. Newman
Attorney at Law
scott@scottnewmanlaw.com

/s/ David J. Hensel